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**UNITED STATES DISTRICT COURT
DISTRICT OF NEW JERSEY**

In re Complaint of ADRIAN AVENA, as
Owner and AA COMMERCIAL, LLC, as
Owner *Pro Hac Vice*, of the Fishing
Vessel CONCH'RD, for Exoneration from
or Limitation of Liability

HON. KAREN WILLIAMS

Civil Action No. 1:21-515 (KMW) (MJS)

NOTICE OF MOTION

PLEASE TAKE NOTICE that the United States of America moves before the Honorable Karen M. Williams, U.S.D.J., on the Motion Day of **April 18, 2022**, for an Order dismissing all claims against the United States, ECF No. 33 (Wolfe Am. Compl.), ECF No. 27 (Petitioners' Cross-cl.), ECF No. 34 (D. Avena Cross-cl.), and ECF Nos. 48 and 50 (Revere Survival, Inc., Cross-cl.), pursuant to Fed. R. Civ. P. 12(c) and 12(h)(3). In support of this motion for judgment on the pleadings and motion to dismiss, the United States relies upon the attached brief. Oral argument is not requested.

Dated: March 25, 2022

Respectfully submitted,

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Principal Deputy Assistant Attorney General
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PHILIP R. SELLINGER
United States Attorney

/s/ Thomas M. Brown

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